

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

STUART JAMES MULLER, LLC,

Plaintiff,

v.

JIUN-LIANG CHEN a/k/a RICKY CHEN  
and ZHAOJIE TECHNOLOGY  
INTERNATIONAL CO. LIMITED d/b/a  
ION ELECTRONIC MATERIALS CO.,  
LTD.,

Defendants.

Civil Action No. 23-12662-PGL

**DEFENDANT ZHAOJIE TECHNOLOGY INTERNATIONAL CO. LIMITED d/b/a ION  
ELECTRONIC MATERIALS CO., LTD. (“IEM”) ASSENTED TO MOTION TO  
EXTEND THE TIME TO FILE ITS RESPONSE TO THE FIRST AMENDED  
COMPLAINT**

Defendant Zhaojie Technology International Co. Limited *d/b/a* Ion Electronic Materials Co., Ltd. (“IEM”) respectfully moves for an extension of time up to and including November 1, 2024 to file its response to the First Amended Complaint (“FAC”).

In further support of its request, IEM states that the FAC alleges several factual allegations and causes of action against IEM that were not previously alleged in the original complaint. IEM requires additional time to investigate these newly alleged facts and claims and prepare its response. This extension will not cause any undue delay in the case because fact discovery has not yet begun. Counsel for Plaintiff assents to this request.

WHEREFORE, IEM respectfully requests an extension of time up to and including November 1, 2024 to file its response to the First Amended Complaint.

Respectfully Submitted,

ZHAOJIE TECHNOLOGY INTERNATIONAL  
CO. LIMITED d/b/a ION ELECTRONIC  
MATERIALS CO., LTD  
By its attorneys,

/s/ Diana A. Balluku  
Diana A. Balluku (BBO # 698128)  
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DATED: October 11, 2024

**LOCAL RULE 7.1(a)(2) CERTIFICATION**

I hereby certify that I conferred with counsel for the Plaintiff prior to filing this Motion for an Extension of Time in a good faith effort to resolve or narrow the issues presented. Counsel for Plaintiff assented to this motion.

/s/ Diana A. Balluku  
Diana A. Balluku

DATED: October 11, 2024

**CERTIFICATE OF SERVICE**

I, Diana A. Balluku, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be served on all those non-registered participants by mail on October 11, 2024.

/s/ Diana A. Balluku  
Diana A. Balluku